

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

v.

T-MOBILE US, INC. and
T-MOBILE USA, INC.,

Defendants.

Case No. 2:20-CV-281-JRG

JURY TRIAL DEMANDED

Honorable Rodney Gilstrap

**DECLARATION OF MATTHEW J. HAWKINSON IN SUPPORT OF
OPENING CLAIM CONSTRUCTION BRIEF BY KAIFI LLC**

I, Matthew J. Hawkinson, declare as follows:

1. I am an attorney at the firm of Hawkinson Yang LLP, and counsel of record for Plaintiff KAIFI LLC (“KAIFI”). I submit this declaration based on my personal knowledge in support of the Opening Claim Construction Brief by KAIFI. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

2. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 6,922,728 (“’728 Patent”) bearing the Bates numbers KAIFI_0007165 – KAIFI_007181.

3. Attached hereto as Exhibit B is a true and correct copy of the curriculum vitae of Professor Dong-Ho Cho, the named inventor of the ’728 Patent, as a professor of electrical engineering at the Korea Advanced Institute of Science and Technology (“KAIST”) bearing the Bates numbers KAIFI_0007182 – KAIFI_000783.

4. Attached hereto as Exhibit C is a true and correct copy of the curriculum vitae of Prof. Cho, as the lead researcher of KAIST’s Ubiquitous Mobile Life Systems Lab bearing the Bates numbers KAIFI_0007184 – KAIFI_0007186.

5. Attached hereto as Exhibit D is a true and correct copy of the assignment from Intellectual Discovery Co., Ltd. to KAIFI, executed and filed with the United States Patent and Trademark Office (“USPTO”) on April 3, 2019 as Reel 49195, Frame 561, and bearing the Bates numbers KAIFI_0011947 – KAIFI_0011950.

6. Attached hereto as Exhibit E is a true and correct copy of highlighted excerpts from the transcript of the deposition of Defendants’ expert witness, Peter Rysavy, on March 31, 2021.

7. Attached hereto as Exhibit F is a true and correct copy of highlighted excerpts from the declaration of Defendants’ expert witness, Peter Rysavy, dated March 15, 2021.

8. Attached hereto as Exhibit G is a true and correct copy of highlighted excerpts from INTERNET ENGINEERING TASK FORCE, RFC 2002 (Oct. 1996), <https://datatracker.ietf.org/doc/rfc2002>, which was produced by Defendants as Exhibit 5 to Mr. Rysavy's Declaration on March 15, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 21st day of April, 2021 at Los Angeles, California.

A handwritten signature in black ink, appearing to read 'Matthew J. Hawkinson', is written over a horizontal line.

Matthew J. Hawkinson